

Robert A. Spanner, Esq. (State Bar No. 60308)
TRIAL & TECHNOLOGY LAW GROUP
A Professional Corporation
545 Middlefield Road, Suite 220
Menlo Park, CA 94025
Telephone: (650) 324-2223
Facsimile: (650) 324-0178

Attorneys for Plaintiff
IP SOLUTIONS, INC.

David J. Miclean (State Bar No. 115098)
Christina D. Jordan (State Bar No. 245944)
FISH & RICHARDSON P.C.
500 Arguello St., Suite 500
Redwood City, CA 94063
Telephone: (650) 839-5070
Facsimile: (650) 839-5071
Attorneys for Defendants BANK OF AMERICA, N.A.
and BANK OF AMERICA TECHNOLOGY
AND OPERATIONS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IP SOLUTIONS, INC.,)	Case No. 07-CV-2774 JF (RS)
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER EXTENDING TIME IN
vs.)	WHICH PLAINTIFF MAY
)	RESPOND TO DEFENDANTS'
BANK OF AMERICA, N.A., <i>et al.</i> ,)	COUNTERCLAIMS
)	
Defendants.)	
)	

TO THE COURT, TO ALL PARTIES, AND TO THE PARTIES' ATTORNEYS
OF RECORD:

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff IP
SOLUTIONS, INC. ("IPS") and Defendants BANK OF AMERICA, N.A. and BANK OF

1 AMERICA TECHNOLOGY AND OPERATIONS, INC. (together, "BANK OF
2 AMERICA") that IPS be granted an additional sixteen (16) days in which to respond to
3 BANK OF AMERICA'S Counterclaims in the above-captioned matter.

4
5 Based on this Stipulation and [Proposed] Order, the date by which IPS must
6 respond to BANK OF AMERICA'S Counterclaims shall be extended to Tuesday,
7 September 4, 2007.

8 This Stipulation is not entered into for purposes of delay, and will not alter the date
9 of any event or any deadline already fixed by Court order. By entering into this stipulation,
10 neither Plaintiffs nor Defendants waive any rights, claims or defenses they may have in this
11 action. The Stipulation may be executed in counterparts and by facsimile signature, each of
12 which, when executed, shall be an original and all of which together shall constitute one
13 and the same stipulation. This Stipulation contains the entire agreement among the parties.
14 The undersigned hereby consent to the terms set forth in the foregoing Stipulation.
15

16 IT IS SO STIPULATED AND AGREED.

17
18
19 Dated: _____ TRIAL & TECHNOLOGY LAW GROUP
20 A Professional Corporation
21 Attorneys for Plaintiff
22 IP SOLUTIONS, INC.

23 By: _____
24 Robert A. Spanner
25
26
27
28

1
2
3 Dated: _____

FISH & RICHARDSON P.C.
Attorneys for Defendants BANK OF AMERICA,
N.A. and BANK OF AMERICA TECHNOLOGY
AND OPERATIONS, INC.

4
5
6
7 By: _____
David J. Miclean

8
9 **DECLARATION OF CONSENT**

10 Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under
11 penalty of perjury that concurrence in the filing of this document has been obtained from
12 Christina D. Jordan.
13

14 Dated: _____

TRIAL & TECHNOLOGY LAW GROUP
A Professional Corporation
Attorneys for Plaintiff
IP SOLUTIONS, INC.

15
16
17
18 By: _____
Robert A. Spanner

19
20 **ORDER**

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.
22

23
24 Dated: _____, 2007

JUDGE OF THE UNITED STATES DISTRICT
COURT